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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S QUARTERLY STATUS REPORT ON THE SATE
RECOMMENDATIONS**

Qwest Corporation ("Qwest") hereby submits this SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Operational Support System Requirements, dated May 1, 2002 (Staff's "Recommendation Report").

I. INTRODUCTION

Staff's "Recommendation Report" includes a SATE recommendation that "Qwest should be required to report to the Commission on a quarterly basis, the status on its progress in implementing the recommendations of Staff and HP".¹ In Qwest's filed

¹ Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Change Management Process and Stand-Alone Test Environment (Staff's "Supplemental CMP/SATE Report") at ¶106.

comments, Qwest committed to providing quarterly reports beginning on June 30, 2002 to address the status of the recommendations.²

HP submitted nine recommendations in its SATE Summary Evaluation Report and four recommendations in its SATE New Release Test Summary Report. Staff submitted three additional SATE recommendations.

As stated in the prior status report,³ Qwest has fully implemented or otherwise addressed all but two of the recommendations. The remaining recommendations relate to finalizing the PO-19 PID, which is at impasse and awaiting ruling by the ACC Staff. This serves as the second quarterly report and provides an updated status on both of the remaining outstanding recommendations. Additionally, status is provided for those recommendations that Qwest has fully implemented but were addressed by AT&T in its recent comments on the first quarterly status report.⁴

II. STATUS OF RECOMMENDATIONS

A. RECOMMENDATIONS FROM HP'S SATE SUMMARY EVALUATION REPORT

1. Recommendation 1: HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.

The plan and process by which SATE is updated with new products to meet CLEC needs are detailed in Qwest's CMP Change Request (CR) prioritization process. The prior status report details this process and indicates that this recommendation has been met, based on the existing, agreed-upon process. However, AT&T states that this

² Qwest Corporation's Comments Regarding CGE&Y's Final Report of the Qwest OSS Test and Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item NO. 2 Operation Support System Requirements; Section 5c.

³ Qwest Corporation's Quarterly Status Report on the SATE Recommendations, dated June 28, 2002.

⁴ AT&T's Comments on Qwest Corporation's Quarterly Status Report on the SATE Recommendations, filed August 19, 2002.

recommendation is only partially satisfied as the current SATE CR prioritization process for those products that are in production but not in SATE is at impasse. The CLECs allege that Qwest is obligated to include these products in SATE, regardless of CLEC prioritization; Qwest believes it must follow the existing and negotiated CMP process for prioritizing and including these products.

Regardless, Qwest's CMP process defines the plan Qwest and the CLECs currently follow to ensure SATE is updated to meet CLECs needs for testing. If Staff rules in favor of a different process when deciding the impasse, Qwest will determine how to ensure that this recommendation *remains* met.

2. Recommendation 2: HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.

The response to this recommendation was provided in detail in the prior status report. Qwest's current documentation processes support the production of documents that enable CLECs to properly utilize SATE. This recommendation has been met.

3. Recommendation 3: To ensure continued adequacy of the SATE, HP recommends:

- ❑ That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined
- ❑ That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish

these goals and objectives

- That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE

The response to this recommendation was provided in detail in the prior status report. Qwest's current documentation includes a staffing plan and process flows, as recommended by HP. This recommendation has been met.

4. Recommendation 4: HP recommends that Qwest publish a list of variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should become a permanent part of the SATE documentation library.

As detailed in the previous status report, Qwest has a process in place to update and publish the errors list on an ongoing basis based on its implementation of this recommendation. However, AT&T suggests that this recommendation has only been partially implemented because Qwest does not provide a change list indicating differences between Release 10 Version 1 and Version 2 and because the Staff does not have a commitment that Qwest will continue providing the variances.

There were no BPL changes between Release 10 Versions 1 and 2 so an updated Change List was not required. Qwest has historically created a BPL Errors List, providing a list of all BPL generated error messages, for each of the IMA releases. Beginning with the 9.0 release, Qwest provided a change summary from one version of the BPL Errors List to the next version. Also beginning with 9.0, Qwest began to create a list of all legacy system errors seen in the prior six months of production, a list of all legacy system errors coded into SATE, and a variance list that included all errors seen in production that were not coded into SATE. Qwest has since created each of these lists

again for the 10.0 and 10.01 releases. The latest version of each of these lists can be found at <http://www.uswest.com/wholesale/ima/edi/document.html>.

Further, the ACC has Qwest's commitment to continue to produce each of these Errors Lists for each release going forward. As stated in the prior status report, this recommendation has been met.

- 5. Recommendation 5: HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECs to determine the full suite of products that shall be included in the SATE.**

As detailed in the prior status report, the proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements.

However, AT&T argues that this recommendation has not been met, relying on statements that have no basis in fact. Further, AT&T makes additional recommendations for how to conduct and incorporate into CMP the ad hoc SATE Users Group.

AT&T's allegation that the SATE Users Group is a "hastily assembled" group is patently incorrect. The SATE Users Group was established in November 2001 as a part of the CMP process to allow for a focused forum in which to deal with SATE-specific communications. According to the Mission Statement provided at the top of each set of published meeting minutes for the SATE Users Group, the purpose of the group is to:

- Give Qwest the opportunity to communicate current plans for its testing environments.
- Give the CLECs the opportunity to communicate their current and future testing needs.
- Jointly present a list of CRs to CMP to ensure that future enhancements of Qwest environments meet those stated CLECs' needs.

There is no need for any coordination between CMP and the SATE Users Group as AT&T suggests. These are independent forums that have very different, but complementary purposes. As noted above, the purpose of the users group is to provide a forum for Qwest and CLECs to communicate plans, ideas, and needs relating to SATE. For example, the SATE Users Group can collectively agree that certain changes to SATE would be beneficial. However, that group cannot make a decision to change SATE. CMP, on the other hand, is the process by which changes actually are made. If the SATE Users Group collectively agreed that a certain change would be beneficial, then a CLEC or Qwest must submit a CR through CMP.

Consistent with Qwest's statements in the previous status report, this recommendation has been met.

6. Recommendation 6: HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.

Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis.

As detailed in the prior status report, Qwest has appropriate processes in place to continue making SATE available for new release testing. This recommendation has been met.

7. Recommendation 7: To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.

Based on this recommendation, HP was asked by the ACC to perform full release testing against SATE 9.0. After completing this second evaluation in March 2002, HP concluded, "the Qwest SATE is adequate to support New Release Testing by a CLEC."⁵

This recommendation has been met.

8. Recommendation 8: HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.

At the time this recommendation was made, Qwest had already proposed a measurement that subsequently was adopted by the Arizona TAG, satisfying this recommendation.

Qwest developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy.⁶ The language of this measure has been agreed and its purpose is to "evaluate Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment."⁷

The Arizona SATE PID was developed by consensus with the CLEC's. However, the standard for this measure was not determined until later, and was set at 95%. Qwest began reporting this measure with November 2001 results in the December 2001 reports.

⁵ HP SATE New Release Test Summary Report, section 2.1.

⁶ Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

⁷ Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

Additionally, based on further CLEC input, Qwest proposed a modification to PO-19, which includes a new sub-measure to execute the same transactions in production and in SATE, to further measure the extent to which SATE mirrors production. Qwest began publishing results for this new sub-measure, PO-19B, with July data in August 2002. The July execution produced results of 99% against a 95% benchmark.

However, the method for determining what product/activity combinations to be used for PO-19B on an ongoing basis is at impasse in Arizona awaiting ACC Staff decision. Qwest determines what product/activity combinations to execute based on a 95% volume threshold – all product/activity combinations with CLEC commercial volumes that fall into the top 95% of the overall volume totals for the most recent 12 month period are used. AT&T and WorldCom brought this issue to impasse in Arizona. They believe that they should have further input into the transaction mix, ensuring that product/activities that account for less than 5% of the overall CLEC volume in a given 12 month period can be included in the PID execution as well.

Qwest has recently proposed a compromise position, establishing a volume threshold that considers all product/activity combinations for which 100 or greater transactions occur during the prior twelve (12) months. This approach ensures that the product/activities that are being used by the CLECs (and are available in SATE) are included in the PID execution. This proposal is currently being evaluated by the CLECs participating in the Arizona TAG.

Consequently, this recommendation cannot be fully met until Qwest receives feedback from the participating CLECs and the ACC Staff rules on the impasse issue.

9. Recommendation 9: HP recommends that Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.

As stated in the prior report, Qwest filed an implementation plan on December 28, 2001, in response to this recommendation to address the eight prior recommendations as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed or is addressing all of the recommendations presented by HP.

This recommendation has been met.

B. RECOMMENDATIONS FROM HP'S SATE NEW RELEASE TEST SUMMARY REPORT

1. Recommendation 1: All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document be incorporated into the SATE User Group and CMP process.

In Qwest's prior status report, it indicated that this recommendation has been met, as the only remaining closed-unresolved issue had been resolved by Qwest after HP's evaluation and was therefore not a candidate for CMP discussion (HPSATEEV2032). AT&T believes Qwest is somehow obligated to bring proof of closure to CMP. There is no need for such a showing, however, because the CLECs can verify themselves that the data document has been appropriately updated.

As Qwest detailed in its Status Report, HP issue HPSATEEV2032 regarding an unexpected error message was corrected after HP closed it with a status of "unresolved". This is the only finding by HP (HP findings are called "issues") or CGE&Y (CGE&Y findings are called Incident Work Orders) that had a final status of Closed/Unresolved in the entirety of the Arizona OSS Test. Further, an incorrect error message certainly did not warrant further discussion in CMP or elsewhere, as AT&T suggests.

One scenario in the SATE data document, FAQ18, was returning actual results that did not match the expected results. HP was executing this transaction in IMA 7.0, using the SATE Data Document version 7.1. The SATE Data Document indicated that the error message should read:

“OSS Gateway: Error caught by data source Message[0] ERROR Unable to Validate Address No address Found This address was not found in PREMIS. Please check your input and try again.”⁸

However, the actual error returned by IMA was:

“OSS Gateway: Error caught by data source Message[0]ERROR: No exact match was found for the address provided.”

Qwest updated the data document to reflect the actual error message generated, and this update can be verified in each version of the data document available on Qwest’s Wholesale Website.⁹ Accordingly, there is no need for AT&T’s request that Qwest “bring sufficient documentation and proof that this error message has been corrected to the CMP”.¹⁰ The SATE Data Document publication is noticed to the CLEC community per CMP guidelines and is available for any CLEC to validate.

Further, AT&T claims that the record of exchanges between Qwest and HP indicate that issue HPSATEEV2037 is in Closed/Unresolved status. This is contrary to HP’s final statement, issued on April 23, 2002, which reads: “HP has reviewed the

⁸ SATE Data Document Version 7.1, Scenario FAQ18

⁹ SATE Data Documents Versions 8.23, 9.14, 10.04, available on Qwest’s Wholesale website: <http://www.qwest.com/wholesale/ima/edi/document.html>

¹⁰ AT&T’s Comments on Qwest Corporation’s Quarterly Status Report on the SATE Recommendations, dated August 19, 2002, section III.

changes in the Master Redline Document, dated 4-16-02. HP has also reviewed the Release Notification from 4/22/02. *HP recommends closure of this issue.*¹¹

As stated in the previous status report, this recommendation has been met.

2. Recommendation 2: Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.

With the proposed updates to PO-19 to include a sub-measure to further measure production likeness, Qwest has submitted a revised PID to the Arizona TAG. As is standard with all proposed PID changes, the TAG members will collaboratively review and approve the proposed language, which will include the agreed-upon level of detail concerning the calculations and measurement process. This recommendation will be met once the impasse issue is decided by the ACC staff and the updated PO-19 PID language is agreed by Qwest and the CLECs.

3. Recommendation 3: Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.

As detailed in the prior status report, Qwest discussed negative testing with the CLECs in the May 21, 2002 SATE Users Group meeting and the CLECs decided that specific error responses should not be required testing, thereby closing this recommendation. AT&T argues that Qwest's approach of addressing this issue to the SATE Users Group was inadequate and constituted "venue shopping".

Given the purpose of the SATE Users Group, Qwest took HP's and Staff's recommendation regarding negative testing to this group for discussion and input.

¹¹ AZ_TI875_HPSATEEV2037_closure_04_23_02 (emphasis added).

CLECs represented in this group included AT&T, Allegiance, COVAD, Eschelon, and WorldCom. Because the published meeting minutes detail the attendees by their name and the company they represent, Qwest is puzzled by AT&T's statement that the record is unclear as to the attendees of the May 21, 2002, meeting to discuss negative testing.

Further, AT&T mischaracterizes Qwest's decision to take this discussion to the SATE Users Group as "venue shopping". Consistent with the SATE Users Group's purpose, Qwest initiated the discussion in the SATE Users Group to obtain the input from the best representation of CLECs that are actually interested in using or are actually using SATE. AT&T representatives participated in the discussion. The SATE Users Group was the logical forum for the discussion of this issue, and the entire CMP body was noticed, as usual.

Based on the collaboratively-agreed CMP process, the fact that the SATE Users Group rejected including additional negative testing scenarios doesn't constitute a final decision on that issue as AT&T would like the Commission to believe. CLECs are free at any time to submit Change Requests ("CRs") through CMP. There is great value in having focused *ad hoc* forums such as the SATE Users Group, but it is the CMP CR process that drives change.

In short, AT&T was in attendance for this negative testing discussion and its attendees agreed it was not necessary. Further, if any CLEC requires additional testing scenarios, it can submit a CR that will be prioritized through the very CMP process AT&T claims Qwest failed to use in this case. .

This recommendation has been met.

4. Recommendation 4: Qwest include scenarios in Data Document reflecting all business rule changes identified in the New Release change summary documentation.

In its prior status report, Qwest detailed its proposed approach for ensuring that new transactions are included in the data document. This approach was deemed appropriate by the CLEC community in the May 21, 2002 SATE Users Group meeting.

AT&T argues that this recommendation cannot be met until the SATE CR impasse is resolved. This is not the case. Regardless of how the impasse is decided, Qwest is obligated to identify the appropriate test scenario in the Data Document or create a new test scenario in the Data Document to appropriately test the release candidate in SATE once it is available there. The outcome of the impasse will not change this process; therefore, this recommendation remains met.

C. STAFF RECOMMENDATIONS

1. Recommendation 1: Qwest should be required to immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs

As detailed in Qwest's response to HP's Recommendation #3 and AT&T's associated comments above, Qwest discussed this topic in the May 21, 2002 SATE Users' Group meeting to solicit feedback from the CLECs concerning their needs for negative testing of BPL edits. CLECs indicated that they require no additional negative testing, contrary to AT&T's assertions in its comments. This recommendation has been fully met based on the input of CLECs utilizing SATE.

- 2. Recommendation 2: Qwest should be required to demonstrate by the time the Commission rules on SATE's adequacy, that it has incorporated all error codes and variances that exist between SATE and production into a single report as originally requested by HP.**

Qwest has published one single list on the Wholesale website, effective May 23, 2002. Additionally, the 10.0 single variance list was published to the Qwest website on June 17, 2002.¹² Qwest provided further detail concerning the Errors List in its comments to Recommendation #4 in Section A above. This recommendation has been fully met.

- 3. Recommendation 3: Qwest should be required to report to the Commission on a quarterly basis, the status of its progress in implementing the recommendations of Staff and HP.**

This report serves as the second status report to the Commission concerning the status of progress on these recommendations. Qwest will continue to file quarterly reports on the two remaining in-progress recommendations.

D. CONCLUSION

As detailed in this report, all but two of the recommendations are fully implemented. The remaining two recommendations are near completion, awaiting impasse resolution by the ACC Staff. An updated status will be reported in the next quarterly report, which will be provided no later than December 27, 2002.

¹² <http://www.qwest.com/wholesale/ima/edi/document.html>

Dated this 27th day of September, 2002.

RESPECTFULLY SUBMITTED,



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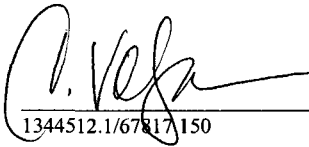
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